



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 30, 2023

**BY E-MAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:    *United States v. Prince Wareham, 22 Cr. 64 (RMB)***

Dear Judge Berman:

The parties write to request an adjournment of the pretrial conference in the above-referenced matter, presently scheduled for tomorrow, Tuesday, January 31, 2023, at 12:30 p.m. The Government has extended a plea offer to the defendant that attempts to resolve both this case and the case *United States v. Prince Wareham, et al.* (11 Cr. 912), pending before Judge Abrams. Mr. Wareham requires additional time to consider that offer. The parties anticipate that within the next 30 days, they will be able to inform the Court whether Mr. Wareham intends to enter a change of plea.

The Government also respectfully requests that the time between today and the rescheduled conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the Government and the defense time to continue to engage in discussions to resolve this matter pretrial. Defense counsel consents to this request.

Conference is adjourned to 3/1/23 at 12:30 pm.  
Time is excluded pursuant to the Speedy Trial  
Act for the reasons set forth in this letter.

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**SO ORDERED:**

Date: 1/30/23

Richard M. Berman, U.S.D.J.

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Respectfully submitted,

DAMIAN WILLIAMS  
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Southern District of New York

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